

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
LUBBOCK DIVISION

STATE OF TEXAS,

*Plaintiff,*

v.

No. 5:23-cv-34-H

MERRICK GARLAND, *et al.*,

*Defendants.*

**TEXAS’S MOTION TO EXCEED PAGE LIMITATIONS**

Texas requests that the Court extend the page limitations for its motion for preliminary injunction, the Defendants’ response, and any reply. There is good cause for this extension, which is not sought for delay.

The federal statute at issue is 1,653 pages long and appropriates \$1.7 trillion to fund many areas of the federal government, including the Department of Homeland Security’s Alternative to Detention Case Management Pilot Program. It also expands protections to pregnant employees, meaning an analysis of previous state and federal law are relevant and required to understand the full extent of the expansion covered under the act at issue. Finally, Texas’s claims concern issues of first impression that have nationwide effects.

Both Texas and the Defendants require additional pages to adequately brief these issues for the Court’s decision. Texas therefore respectfully requests that the Court set limitations of 50 pages for Texas’s preliminary-injunction motion and the Defendants’ opposition and 25 pages for Texas’s reply.

Dated April 4, 2023.

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**CERTIFICATE OF CONFERENCE**

I certify that I conferred with counsel for Defendants on April 4, 2023, and Defendants informed me that they do not oppose this motion.

/s/ *Ethan Szumanski*

**CERTIFICATE OF SERVICE**

I certify that on April 4, 2023, this motion to exceed page limitations was filed through the Court's CM/ECF system, which served it upon all counsel of record.

/s/ *Ethan Szumanski*